

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EDGAR ITURBIDE, on behalf of himself and
others similarly situated,

Plaintiff,

v.

CHO FAMILY DYNASTIA, INC. d/b/a FLOR
DE MAYO, FLOR DE MAR, INC., d/b/a FLOR
DE MAYO, MARVIN CHU, DENNIS CHU and
NELSON CHO,

Defendants.

Case No.: 17 CV 0596

Netburn, M.J.

**NOTICE OF PLAINTIFF'S
UNOPPOSED MOTION FOR
APPROVAL OF ATTORNEYS'
FEES, ADMINISTRATION FEES
AND REIMBURSEMENT OF
EXPENSES**

For the reasons set forth in (i) the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees and Reimbursement of Expenses and (ii) the Declaration of C.K. Lee in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees, Administration Fees and Reimbursement of Expenses and Unopposed Motion for Approval of Class Representative Service Award, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order: (1) awarding Class Counsel \$100,000 in attorneys' fees, which is approximately one-third of the Settlement Fund established by Defendants, plus costs and expenses in the amount of \$2,275, to be paid from the Settlement Fund; and (2) awarding Advanced Litigation Strategies, LLC, as Settlement Administrator, administration fees of \$25,000 to be paid from the Settlement Fund.

Dated: January 5, 2018

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee

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*Attorneys for Plaintiff, FLSA Collective
Plaintiffs and the Class*